

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

WILLIAM J. RAUCH,)	Civil Action No.: 9:05 376-23
)	
Plaintiff,)	
)	
-vs-)	
)	
JENNIFER D. RAUCH a/k/a JENNIFER)	PLAINTIFF'S RESPONSE TO
DAVIS; RICHARD DEBOE; DEUTSCHE)	DEFENDANTS DEUTSCHE BANK
BANK SECURITIES, INC. f/k/a)	SECURITIES INC. AND RICHARD
DEUTSCHE BANC ALEX BROWN, INC.;)	DEBOE'S FIRST REQUEST FOR
)	PRODUCTION OF DOCUMENTS AND
Defendants.)	TANGIBLE THINGS
)	

TO: JOEL H. SMITH, ESQUIRE AND BRIAN COMER, ESQUIRE ATTORNEYS FOR
DEFENDANT, DEUTSCHE BANK SECURITIES, INC., F/K/A DEUTSCHE BANC
ALEX BROWN VENTURE, INC.; AND HAMILTON OSBORNE, JR., ESQUIRE
AND THOMAS R. GOTTSALL, ESQUIRE ATTORNEYS FOR RICHARD DEBOE:

NOW COMES Plaintiff William J. Rauch ("Plaintiff"), who, by and through his
undersigned counsel, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure,
hereby issues its Response to the Request for Production propounded by Defendant Deutsche
Bank Securities Inc. ("DBSI") and Defendant Richard DeBoe ("Deboe") (hereinafter
collectively referred to as "Defendants"), as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to the Requests for Production to the extent they call for
Responses that would disclose privileged information, including information protected by the
attorney-client privilege, attorney work-product doctrine, confidential business information or
trade secret privileges, or any other applicable privileges.

2. Plaintiff objects to the Requests for Production to the extent they request
information, documents, things, facts, opinions or any other matter prepared in anticipation of

litigation or for trial, including such trial preparation materials relating to expert witnesses, which is outside the scope of discovery permitted by F.R.C.P. 26(b).

REQUESTS FOR PRODUCTION

1. All documents, communications and records of any communications relating to any or all of the following: (i) the naming of Jennifer D. Rauch a/k/a Jennifer Davis ("Davis") as a party defendant in this action; (ii) the purpose(s) for including her as a party defendant; and (iii) the intention of Plaintiff with respect to enforcement of a judgment or otherwise pursuing recovery in this action against Davis.

OBJECTION: Plaintiff objects to this request on the basis that it seeks information protected by the attorney-client and/or work product privilege and/or information prepared in anticipation of litigation. Subject to and without waiving said objections, Plaintiff does not have in its possession any documents relating to this request that are not protected by the attorney-client privilege.

2. All documents, communications and records of any communications relating to any or all of the following: (i) negotiations between Plaintiff and Davis with respect to naming her as a party defendant in this action; and (ii) agreements or understandings between Plaintiff and Davis with respect to her being named as a defendant in this action.

OBJECTION: Plaintiff objects to this request on the basis that it seeks information protected by the attorney-client and/or work product privilege and/or information prepared in anticipation of litigation. Subject to and without waiving said objections, Plaintiff does not have in its possession any

documents relating to this request that are not protected by the attorney-client privilege.

3. All documents, communications and records of any communications relating to Plaintiff's purposes in commencing this action, including but not limited to with respect to: (i) Davis; (ii) DBSI; and (iii) DeBoe.

OBJECTION: Plaintiff objects to this request on the basis that it seeks information protected by the attorney-client and/or work product privilege and/or information prepared in anticipation of litigation. Subject to and without waiving said objections, Plaintiff would refer Defendants to his Complaint.

ATTORNEYS FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that I have served counsel for all parties in the foregoing matter with a copy of this pleading by:

☒ depositing in the U.S. Mail a copy of same in properly addressed envelope with adequate postage thereon

☐ handing counsel a copy thereof

☐ by ~~hand~~mail and depositing in the U.S. Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 8th day of June 2005

By: [Signature]

By:

[Signature]
Ralph E. Tupper, Fed. Bar ID: 4150
Stacey P. Canaday, Fed. Bar ID: 8015
Tupper, Grimsley & Dean, P.A.
Post Office Box 2055
Beaufort, South Carolina 29901-2055

John E. Parker, Fed. Bar ID: 2977
Peters, Murdaugh, Parker, Elztroth & Detrick, P.A.
Post Office Box 457
Hampton, South Carolina 29924-0457

June 3, 2005